

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 02/28/2022
(Insert date)**I - REGISTRANT**

1. (a) Name of Registrant

Alexandria Group International LLC

(b) Registration Number

6707

(c) Primary Business Address

4115 S Hicks Street, Lawrenceville, VA 23868

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Ceased
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5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
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(b) During this 6 month reporting period, did any employee or individual working in any other capacity begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
See Appendix for Response					

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☒ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

American University of Iraq- Baghdad

Date of Termination

01/31/2022

8. Has the registrant added any new foreign principal(s)² during this 6 month reporting period?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date Added

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

Atanas, Plamen, and Hristina Bobokov
Minyu and Reni Staykov
Investbank JSC

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³Yes ☐No ☐N/A ☒Exhibit B⁴Yes ☐No ☐N/A ☒

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period?

Yes ☒No ☐

If yes, has the registrant filed an amendment to these exhibits?

Yes ☒No ☐

If no, please file the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
See Appendix for Response	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

See Appendix for Response

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

14. (a) **RECEIPTS-MONIES**

If no, please explain why no monies were received.

\$	273,601.12
<hr/>	
Total	

If no, please file the required Exhibit D.

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain why no disbursements were made.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
Atanas, Plamen, and Hristina Bobokov	12/28/2021	Service Provider	Video-call Service Renewal	\$ 74.95	
Atanas, Plamen, and Hristina Bobokov	-----	-----	-----	----->	\$ 74.95
Minyu and Reni Staykov	12/28/2021	Service Provider	Video-Call Service Renewal	\$ 74.95	
Minyu and Reni Staykov	-----	-----	-----	----->	\$ 74.95
Investbank JSC	09/22/2021	Service Providers	Local Transportation	\$ 41.63	
Investbank JSC American	-----	-----	-----	----->	\$ 41.63
University of Iraq- Baghdad American	12/14/2021	Service Provider	Working Meal	\$ 128.86	
University of Iraq- Baghdad American	12/14/2021	Service Providers	Local Transportation	\$ 84.86	
University of Iraq- Baghdad American	-----	-----	-----	----->	\$ 213.72

\$ 405.25
Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
10/04/2021	Marshall Harris	Otto Wachsmann	Credit Card	\$ 250.00
10/22/2021	Marshall Harris	Liz Cheney	Check	\$ 250.00

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes ☐ No ☒

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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Total

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (specify) _____ | | | |

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- | | | |
|--|---|---|
| <input type="checkbox"/> Public officials | <input type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Other (specify) _____ | | |

20. Indicate the language used in the informational materials:

- ☐ English ☐ Other (specify) _____

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

If no, please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature ¹³
<u>03/29/2022</u>	<u>Marshall Harris</u>	<u>/s/Marshall Harris</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

3.29.22MARSHALL HARRISMarshall Harris

Appendix
Response to Item 5(b)

Item 5(b): During this 6 month reporting period, did any employee or individual working in any other capacity begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity?

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
Angel Velitchkov	Atanas, Plamen, and Hristina Bobokov		UNITED STATES		11/04/2021
Mr. Clifford Karchmer	Investbank JSC	309 Greenhill Way Silver Spring, MD 20904	UNITED STATES	National Security Consultant	02/05/2022

Appendix

Response to Item 11

Item 11: During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal(s)	Activities/Services
Atanas, Plamen, and Hristina Bobokov	The registrant continues to consult regarding advancement of the foreign principals' goals regarding the business climate, civil society, corruption, transparency, the judiciary, rule of law and political developments in Bulgaria.
Minyu and Reni Staykov	The registrant continues to consult regarding advancement of the foreign principals' goals regarding the business climate, civil society, corruption, transparency, the judiciary, rule of law and political developments in Bulgaria.
Investbank JSC	The primary registrant continued to assist the foreign principal with its agenda to advance its business agenda and reputation in the United States. The primary registrant initiated information requests and review of procedural issues.
American University of Iraq- Baghdad	The registrant continued to provide counsel regarding the foreign principal's relations with the U.S. Administration, Congress, think-tanks, and media, and its formation and composition of a Board of Trustees.

Appendix

Response to Item 12-Desc

Atanas, Plamen, and Hristina Bobokov: The registrant continued to consult regarding advancement of the foreign principals' goals regarding the business climate, civil society, corruption, transparency, the judiciary, rule of law and political developments in Bulgaria. Short-form registrants Marshall Harris and Angel Velitchkov reported periodically to and consulted with the Bobokov and Staykov foreign principals on U.S.-related political and related developments further to the primary registrant's FARA registrations and in furtherance of each foreign principal's goals in the United States. No political activities were undertaken separately for foreign principals Bobokov or Staykov. All activities were on behalf of both principals.

Minyu and Reni Staykov: The registrant continued to consult regarding advancement of the foreign principals' goals regarding the business climate, civil society, corruption, transparency, the judiciary, rule of law and political developments in Bulgaria. Short-form registrants Marshall Harris and Angel Velitchkov reported periodically to and consulted with the Bobokov and Staykov foreign principals on U.S.-related political and related developments further to the primary registrant's FARA registrations and in furtherance of each foreign principal's goals in the United States. No political activities were undertaken separately for foreign principals Bobokov or Staykov. All activities were on behalf of both principals.

Investbank JSC: Marshall Harris and Angel Velitchkov, short-term registrants for the primary registrant, reported periodically to and consulted with the foreign principal on U.S. political and related developments further to the primary registrant's FARA registrations and in furtherance of the foreign principal's goals in the United States.

American University of Iraq- Baghdad: The registrant continued to provide counsel regarding the foreign principal's relations with the U.S. Administration, Congress, think-tanks, and media, and its formation and composition of a Board of Trustees.

Appendix

Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Atanas, Plamen, and Hristina Bobokov	11/14/2021	Todd Prince - Radio Free Europe	Telcon and e-mail exchange	Discussion of Bulgarian political developments
Atanas, Plamen, and Hristina Bobokov	02/16/2022	Todd Prince - Radio Free Europe	e-mail exchange	Dscussion of Bulgarian political developments
Minyu and Reni Staykov	11/14/2021	Todd Prince - Radio Free Europe	Telcon and e-mail exchange	Discussion of Bulgarian political developments
Minyu and Reni Staykov	02/16/2022	Todd Prince - Radio Free Europe	e-mail exchange	Dscussion of Bulgarian political developments
Investbank JSC	12/20/2021	Kelleigh Miller - Drug Enforcement Agency	E-mail	Freedom of Information Act (FOIA) request re Investbank
Investbank JSC	12/20/2021	Director - FincEN/ Treasury Department	E-mail	FOIA request re Investbank
Investbank JSC	12/20/2021	Kristin Brude-Everett - Organized Crime Drug Enforcement Task Forces /Justice Department	E-mail	FOIA request re Investbank
Investbank JSC	12/20/2021	Amanda Marchand-Jones - Criminal Division - Justice Department	E-mail	FOIA request re Investbank
Investbank JSC	12/20/2021	Information Disclosure Secretary - Federal Reserve System	E-mail	FOIA request re Investbank
Investbank JSC	12/20/2021	Information/Privacy Coordinator - Central Intelligence Agency	E-mail	FOIA request re Investbank
Investbank JSC	12/20/2021	Daniel Dembowski - Interpol/US Central	E-mail	FOIA request re Investbank
Investbank JSC	12/20/2021	FOIA Office - Federal Bureau of Investigation	Online submission	FOIA request re Investbank
Investbank JSC	01/25/2022	FOIA Office - Federal Bureau of Investigation	Letter	FOIA request re Petia Slavova, Investbank primary shareholder

Foreign Principal(s)	Date	Contact	Method	Purpose
Investbank JSC	01/29/2022	Aria Witte-Simpson - National Security Division/Justice Department	E-mail	FOIA request re Petia Slavova (Investbank primary shareholder)
Investbank JSC	02/09/2022	Ann Barker - Info/Privacy Coordinator - Central Intelligence Agency	Letter	FOIA request re Petia Slavova (Investbank primary shareholder)
Investbank JSC	02/15/2022	Office of Information Programs - State Department	E-mail	FOIA request re Investbank

Appendix

Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
Atanas, Plamen, and Hristina Bobokov	09/22/2021	Bobokovs	Perform Services	\$15,000.00	
Atanas, Plamen, and Hristina Bobokov	10/22/2021	Bobokovs	Perform Services	\$ 7,500.00	
Atanas, Plamen, and Hristina Bobokov	01/10/2022	Bobokovs	Perform Services	\$ 7,500.00	
Atanas, Plamen, and Hristina Bobokov	02/23/2022	Bobokovs	Perform Services	\$ 7,500.00	
Atanas, Plamen, and Hristina Bobokov	-----	-----	-----	----->	\$37,500.00
Minyu and Reni Staykov	09/23/2021	Staykovs	Perform Services	\$10,886.12	
Minyu and Reni Staykov	11/29/2021	Staykovs	Perform Services	\$14,965.00	
Minyu and Reni Staykov	01/12/2022	Staykovs	Perform Services	\$ 7,465.00	
Minyu and Reni Staykov	02/15/2022	Staykovs	Perform Services	\$14,965.00	
Minyu and Reni Staykov	-----	-----	-----	----->	\$48,281.12
Investbank JSC	10/27/2021	Investbank	Perform Services	\$31,000.00	
Investbank JSC	12/21/2021	Investbank	Perform Services	\$31,000.00	
Investbank JSC	-----	-----	-----	----->	\$62,000.00
American University of Iraq- Baghdad	09/15/2021	American University of Iraq - Baghdad (AUIB)	Perform Services	\$20,970.00	
American University of Iraq- Baghdad	10/14/2021	AUIB	Perform Services	\$20,970.00	
American University of Iraq- Baghdad	11/26/2021	AUIB	Perform Services	\$20,970.00	
American University of Iraq- Baghdad	12/20/2021	AUIB	Perform Services	\$20,970.00	
American University of Iraq- Baghdad	12/20/2021	AUIB	Perform Services	\$20,970.00	
American University of Iraq- Baghdad	01/19/2022	AUIB	Perform Services	\$20,970.00	
American University of Iraq- Baghdad	-----	-----	-----	----->	\$125,820.00